

**THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**

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9	TRENTON SMITH, individually and) Case No.: 8:25-cv-161-FWS-DFM
10	on behalf of all others similarly)
11	situated,) [Discovery Document: Referred to
	Plaintiffs,) Magistrate Judge Douglas F.
12	vs.) McCormick]
)
13	JOHN SHAHIDI, an individual;) [PROPOSED] ORDER
14	NELK, INC. dba NELK, FULL) GRANTING PLAINTIFFS’
15	SEND, a Canadian Company,) MOTION TO OVERRULE
16	METACARD, LLC, a Delaware) GENERAL AND BOILERPLATE
17	Limited Liability Company; NELK) OBJECTIONS, COMPEL
18	USA, INC., a Delaware Corporation;) FURTHER RESPONSES TO
19	KYLE FORGEARD, an individual.) DISCOVERY & ENTER
	Defendants.) PROTECTIVE ORDER
)
20) Hearing Date: Oct. 14, 2025
21) Time: 10:00 a.m.
22)
23) Discovery Cut Off: April 9, 2026
24) Pretrial Conference: Oct. 29, 2026
25) Trial Date: Nov. 17, 2026
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PROPOSED ORDER

Having considered Plaintiffs' motion to compel further responses to interrogatories and requests for production without general objections or boilerplate objections, and a privilege log attorney for work product or attorney client withheld objections (where appropriate), and further responses to interrogatories 2, 3, 7 and 8, and requests for production of documents numbers 1 to 24, and 26 to 54, without non privilege objections within (10) days, along with all responsive documents, and a privilege log if applicable, and for entry of the Protective Order with Plaintiff's compromise regarding maintaining documents, post litigation, the parties' joint stipulation, declarations and supporting exhibits, and good cause appearing, the Court makes the following Order:

Plaintiff's motion to compel further responses by defendants Nelk, Inc., Nelk USA, Inc., Metacard, LLC, Kyle Forgeard and John Shahidi (collectively, "Defendants") is hereby GRANTED in its entirety.

Defendants shall provide amended further responses to interrogatories 2, 3, 7 and 8, and requests for production of documents numbers 1 to 24, and 26 to 54, without non privilege objections within (10) days, any privilege log (for attorney client or attorney work product privilege), along with all responsive documents.

Plaintiff shall provide a clean version of the proposed Protective Order with Plaintiff's language to compromise regarding maintaining documents post litigation for entry by this Court.

IT IS SO ORDERED.

DATED: _____, 2025

Hon. Douglas F. McCormick
United States Magistrate Judge